

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

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|-------------------------------|---|-----------------------------|
| BILLY R. WILLIAMS, | : | |
| | : | |
| Plaintiff, | : | Civil Action No. 03-239E |
| | : | |
| vs. | : | Hon. Maurice B. Cohill, Jr. |
| | : | |
| | : | |
| PENNSYLVANIA STATE POLICE, AN | : | |
| AGENCY OF THE COMMONWEALTH | : | |
| OF PENNSYLVANIA, | : | |
| | : | Electronically Filed |
| Defendant. | : | |

**PLAINTIFF'S OPPOSITION TO DEFENDANT'S MOTION FOR
CONTINUANCE OF TRIAL DATE**

AND NOW, comes Plaintiff, Billy R. Williams, by and through his counsel, Neal A. Sanders, Esquire, and Dirk D. Beuth, Esquire, of the Law Offices of Neal A. Sanders and files this Plaintiff's Opposition To Defendant's Motion For Continuance Of Trial Date and states as follows:

1. Plaintiff and Plaintiff's counsel, Neal A. Sanders and Dirk D. Beuth, object to the continuance of the October 9, 2007 jury trial for the Defendant's stated reasons.
2. Videotaping of the trial testimony of Sidney Simon by Defendant at an agreed upon date and time prior to October 5, 2007 should be the remedy or outcome of this scheduling conflict for Defendant.

3. Defendant has failed to pursue this alternative with the Plaintiff's counsel and Plaintiff respectfully requests that the Court deny Defendant's Motion for Continuance for the stated reasons and Order that Defendant secure their defense trial testimony of Sidney Simon and cross examination by Plaintiff's attorney by videotape prior to October 5, 2007 and let the videotape be shown by Defendant to the jury during Defendant's defense later in the week of October 9, 2007 or the week of October 15, 2007.

An appropriate Order is attached.

Respectfully submitted,

LAW OFFICES OF NEAL A. SANDERS

Dated: August 28, 2007

By: /s/Neal A. Sanders
Neal A. Sanders, Esquire
PA ID NO. 54618
Co-Counsel for Plaintiff,
Billy R. Williams

By: /s/Dirk D. Beuth
Dirk D. Beuth, Esquire
PA ID NO. 76036
Co-Counsel for Plaintiff,
Billy R. Williams

Law Offices of Neal A. Sanders
1924 North Main Street Ext.
Butler, PA 16001

(724) 282-7771